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June 6, 2002

Ms. Linda Meyer (WCM-121)  
Project Manager RCRA/Superfund  
U.S. EPA Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

**Subject: Simplot Plant Area of the Eastern Michaud Flats Superfund Site – Remedial Design/Remedial Action Monthly Progress Report No. 1 (May 2002)**

Dear Ms. Meyer:

This letter documents the progress made in the remedial design/remedial action at the Simplot Plant Area portion of the Eastern Michaud Flats Superfund Site. This progress report has been prepared in accordance with the requirements of Paragraph 29 of the Consent Decree and the Statement of Work (SOW).

The Consent Decree was entered on May 9. Work performed during the reporting period consisted of initiation of preparation of the remedial design/construction completion documents set out in the SOW.

#### **I. Activities/Tasks**

The following principal actions were performed:

- Began preparation of the East Overflow Pond Construction Completion Report, the Pre-Final Remedial Dewatering Pit Remedial Design Report (RDR), the Draft Gypsum Roads RDR, The Draft Groundwater Extraction RDR, the Pre-Final Groundwater Monitoring RDR and the Institutional Controls Program report;
- Participated in a meeting with EPA, IDEQ, and the Shoshone-Bannock Tribes on May 16, which included discussion of the elements of work for the Simplot Plant Area and technical issues associated with each; and
- Received letters from EPA on May 31, identifying EPA's Project Coordinator and conditionally disapproving MFG, Inc. as Simplot's Supervising Contractor.

The following principal actions are expected in the period from June 1 to July 15 are:

- Continue report preparation; and
- Provide EPA with requested information on MFG's capabilities.

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**II. Laboratory Activities and Data Generated**

None.

**III. Deliverables and Milestones Completed in Reporting Period**

None.

**IV. Deliverables and Milestones Expected to be Completed in Next Reporting Period.**

None.

**V. Issues Identified and Actions Taken to Provide Resolution**

In accordance with Paragraph 10 of the Consent Decree, Simplot provided EPA with qualifications of MFG, Inc. as its Supervising Contractor. The information was sent by certified mail on November 6, 2001 and received and signed for by EPA on November 10, 2001. As noted above, EPA issued a conditional disapproval of MFG on May 31, 2002 because the Statement of Qualifications “fails to include demonstrated experience with ex-situ treatment of extracted groundwater containing inorganic constituents.” The letter further requests Simplot to “provide supplemental information demonstrating MFG, Inc. has the staff, capabilities and experience essential to the successful design and implementation of the required groundwater remediation system, specifically experience with the design of a water treatment system for inorganic constituents.”

In accordance with the Consent Decree, Simplot will provide such information within 30 days. However, the following should be noted in regard to EPA’s request. First, and most important, EPA’s Record of Decision (ROD) does not require treatment of extracted groundwater, but requires that the water be recycled into the Don Plant. In fact EPA’s selected remedy does not even mention any potential requirement for treatment of groundwater (ROD, page 64). The issue of potential treatment appears in the Consent Decree SOW as a contingency if the water cannot be recycled directly to the Don Plant process. In this event, it would be necessary to discharge the water to the Portneuf River, after treatment to meet discharge standards.

Furthermore, information was provided in the Statement of Qualifications on experience that MFG has had with the design and installation of groundwater extraction systems and wastewater treatment systems that do remove inorganic constituents. Because EPA’s ROD does not require treatment and Simplot is confident that extracted groundwater will be recycled to the Don Plant (the process currently uses approximately 4,000 gallons per minute of extracted groundwater), no qualifications regarding treatment are believed to be necessary. However, they will be provided to respond to EPA’s request.

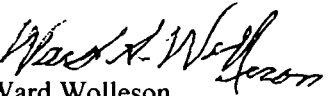
**VI. Activities Undertaken in Support of the Community Relations Plan**

None.

Ms. Linda Meyer – EPA  
June 6, 2002  
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I hope this provides you with the information you require. Please do not hesitate to call me at (208) 672-2865 if you have any questions or comments.

Sincerely,

  
Ward Wolleson  
Senior Environmental Engineer  
J. R. Simplot Company

cc: Douglas Tanner, IDEQ  
Susan Hanson, Shoshone-Bannock Tribes  
Andy Koulermos, MFG  
Alan Prouty, J.R. Simplot Company

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